

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

PEGGY JONES

PLAINTIFF

v.

NO. 4:19-CV-00234-JM

LARRY JEGLEY, Prosecuting Attorney For Pulaski County,
In His Official Capacity;
SYBAL JORDAN HAMPTON, In Her Official Capacity As A
Member Of The Arkansas Ethics Commission;
TONY JUNEAU, In His Official Capacity As A Member Of The
Arkansas Ethics Commission;
ASHLEY DRIVER YOUNGER, In Her Official Capacity As A
Member Of The Arkansas Ethics Commission;
ALICE L. EASTWOOD, In Her Official Capacity As A Member
Of The Arkansas Ethics Commission;
LORI KLEIN, In Her Official Capacity As A Member Of The
Arkansas Ethics Commission

DEFENDANTS

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Pursuant to Federal Rule of Civil Procedure 15, Plaintiff Peggy Jones respectfully requests that this Court grant her leave to file an amended complaint. A copy of the proposed amended complaint is attached as an exhibit hereto. In further support of this motion, Plaintiff states as follows:

1. Plaintiff seeks leave to file an amended complaint in this case for two purposes: (1) to add additional allegations regarding the campaign contributions she would make absent the Blackout Period and (2) to add an additional plaintiff, Senator Mark Johnson, one of the intended recipients of her campaign contributions.

2. According to Rule 15(a)(2), "[t]he court should freely give leave when justice so requires." Allowing Plaintiff to file the amended complaint is in the interest of justice, as it allows the issues in this case to be more fully set forth in the pleadings. Furthermore, allowing Senator Johnson to participate in this case is also in the interest of justice, given that his rights are directly affected by the Blackout Period.

3. This case is still in its initial stages. Among other things, the initial scheduling conference among the parties has yet to occur. As such, there will be not prejudice to Defendants from the filing of this amended complaint.

4. Plaintiff requested consent from Defendants before filing this motion. Counsel for Defendants stated that he would be unable to provide a response to the request until next week. Due to the expedited matter of these proceedings, Plaintiff is filing the instant motion without awaiting Defendants' consent.

For these reasons, Plaintiff respectfully requests that this Court grant her leave to file the attached amended complaint, and for such further and additional relief as to which she may be entitled.

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